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 8 *Tyquan Brown, Gabriel Fentanes,*
Alvin Harper, Quuveii Harris,
 9 *Elias Rasmussen and Jeremy Reese*

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 TONY HOBSON,

Case No. 2:22-cv-02088-JAD-MDC

13 Plaintiff,

14 v.

15 AWP CURRIER, et al.,

**STIPULATION TO EXTEND
 DISPOSITIVE DEADLINE UNTIL THIS
 COURT HAS RENDERED A DECISION
 REGARDING HOBSON'S MOTION TO
 COMPEL (ECF NO. 57)**

16 Defendants.

17 Pro Se Plaintiff Tony Hobson (Hobson), and Alejandro Arias, Victoria Becerra,
 18 Tyquan Brown, Gabriel Fentanes, Alvin Harper, Quuveii Harris, Elias Rasmussen and
 19 Jeremy Reese, by and through counsel, Aaron D. Ford, Attorney General for the State of
 20 Nevada, and Rudolf M. D'Silva, Deputy Attorney General, respectfully submit the following
 21 stipulation to extend the dispositive motion deadline from April 15, 2025 to thirty (30) days
 22 from the date in which this Court renders a decision regarding Hobson's Motion to Compel
 23 (ECF No. 57).

24 MEMORANDUM OF POINTS AND AUTHORITIES

25 I. BACKGROUND

26 Hobson is in the custody of the Nevada Department of Corrections (NDOC) and is
 27 pursuing a civil rights action under 42 U.S.C. § 1983. ECF No. 7 at ¶ 1. During mandatory
 28 screening, pursuant to 28 U.S.C. § 1915A(a), this Court allowed Hobson to proceed on the

1 following claims: (1) a First Amendment retaliation claim; and (2) an Eighth Amendment
2 claim about harassing cell searches. ECF No. 11 at 10:1-6.

3 Hobson has filed a Motion to Compel Discovery (Motion) to which Defendants have
4 responded to. See ECF No. 57; ECF No. 59; ECF No. 60. The parties have met and conferred
5 regarding Hobson's Motion on March 18, 2025. The Parties mutually agreed to request this
6 Court stay the dispositive motion deadline and extend it until thirty (30) days after this
7 Court has made a determination on Hobson's Motion to Compel.

8 II. LEGAL STANDARD

9 Pursuant to Fed. R. Civ. P. 6(b), the "court may, for good cause, extend the time . . .
10 with or without motion or notice . . . if a request is made, before the original time or its
11 extension expires." Stipulations relating to proceedings before the court... must be in
12 writing and signed by all parties who have appeared or their attorneys. LR 7-1(a). No
13 stipulation relating to proceedings before the court ... are effective until approved by the
14 court. LR 7-1(b).

15 III. PARTIES STIPULATION AND PROPOSED ORDER

16 Parties believe good cause exists to extend the dispositive motion deadline because
17 there is a pending discovery dispute that has not been resolved. In the interest of justice,
18 it would be best for this discovery dispute to be resolved prior to either party filing
19 dispositive motions so that each side has the materials they respectively feel are necessary
20 to adequately draft their respective dispositive motions and move forward with this
21 lawsuit. Also, because the dispositive motion deadline is approaching soon on April 15,
22 2025, and the parties are unsure if a decision on this matter will occur prior to or after the
23 dispositive motion deadline, Parties believe it is appropriate to extend the dispositive
24 motion deadline by 30 days from the date this Court issues an order on Hobson's Motion to
25 Compel. See *Ahanchian v. Xenon Pictures, Inc.*, 624 F.3d 1253, 1260, (9th Cir. 2010)
26 (holding that the "district court abused its discretion in denying party's timely motion" to
27 extend time because the party "demonstrated the 'good cause' required by Rule 6, and
28

1 because there was no reason to believe that [the party] was acting in bad faith or was
2 misrepresenting his reasons for asking for the extension”).

3
4 DATED this 2 day of April, 2025.

DATED this 1st day of April, 2025.

AARON D. FORD

Attorney General

5
6 By: /s/ Tony Hobson
7 Tony Hobson (#1165963)
8 Pro Se Plaintiff

By: /s/ Rudolf M. D'Silva
RUDOLF M. D'SILVA (Bar No. 16227)
Deputy Attorney General
Attorneys for Defendants

9 IT IS SO ORDERED.

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12 Hon. Maximiliano D. Couvillier III
United States Magistrate Judge
Dated: 4/9/2025
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CERTIFICATE OF SERVICE

I certify that I am an employee of the State of Nevada, Office of the Attorney General, and that on April 1, 2025, I electronically filed the foregoing **STIPULATION TO EXTEND DISPOSITIVE DEADLINE UNTIL THIS COURT HAS RENDERED A DECISION REGARDING HOBSON'S MOTION TO COMPEL (ECF NO. 57)** via this Court's electronic filing system. Parties who are registered with this Court's electronic filing system will be served electronically. For those parties not registered, service was made by depositing a copy for mailing in the United States Mail, first-class postage prepaid, addressed to the following:

Tony Hobson, #1165963
Southern Desert Correctional Center
PO Box 208
Indian Springs, NV 89070
Plaintiff, Pro Se

/s/ Jamile Vazquez
Jamilé Vazquez, Employee of the Office of
the Nevada Attorney General